

DOCKETED
PROPOSED RULE

PR-50

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DUKE POWER COMPANY

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(50 FR 11824)

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VICE PRESIDENT
NUCLEAR PRODUCTION

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May 28, 1985

DOCKETED
USNRC

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Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Attention: Docketing and Service Branch

Subject: Proposed Rule 10 CFR Part 50
Communications and Procedures
Amendments

The NRC requested in a Federal Register Notice dated March 26, 1985 (Vol. 50, No. 58, FR 11884-11891), comments on the subject proposed rule 10 CFR Part 50. In response, Duke Power Company offers the following for consideration.

General Comments, 10 CFR, Part 50.

Duke supports the overall concept and intent of this rule and commends the Commission efforts to improve communication procedures between the Commission and licensees. Copy and distribution costs of written communications should be a concern to both parties. Therefore, Duke questions the true need for the number of copies specified in section 50.4(b)(1) at FR 11885. If the action agency is NRC, Washington D.C., then the signed original would be appropriately sent to Washington with one (1) copy sent to the appropriate Region and vice versa. Based on need and a current distribution list the Headquarters or appropriate Region could generate the required number of copies for use within the agency.

Specific Comments, 10 CFR, 50.4.

The items cited below do not appear to fall directly into the category of "Permits, licenses and amendments" and should be listed under 50.4(b)(2).

50.4(b)(1)(v) - Analysis of hydrogen control system pursuant to §50.44(c)(3)(vi)(A):

50.4(b)(1)(vi) - Proposed schedule for meeting the requirements for a hydrogen control system pursuant to §50.44(c)(3)(vii)(A):

50.4(b)(1)(vii) - Analysis to ensure safe plant operation pending completion of equipment qualification pursuant to §50.49(i):

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add: Steve Scott, W-548

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Acknowledged by card.....

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50.4(b)(1)(ix) - Information demonstrating compliance with requirements for reduction of risk from anticipated transients without scram (ATWS) events pursuant to §50.62(c) 6 and (d):

50.4(b)(1)(xv) - Information concerning the modification of structures systems for components of a facility pursuant to §50.109:

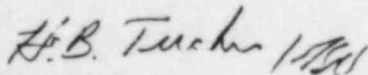
50.4(b)(1)(xvi) - Evaluation of the potential for effects from long-term buildup of radioactive of the Regulatory Staff,"
A.3.a of this part:

50.4(b)(1)(xvii) - Complete listing of each computer program used in emergency core cooling system (ECCS) Appendix K.II.1.c of this part:

We appreciate this opportunity to provide you with our comments. We trust that our comments will be considered and that the Commission will move promptly to complete this rulemaking.

If there are any questions or problems concerning this subject, please advise.

Very truly yours,



Hal B. Tucker

JWD:smh